**April 11, 2003** 

### PLANNING AND ACTIVATING COMMUNITY-BASED OUTPATIENT CLINICS

- **1. PURPOSE:** This Veterans Health Administration (VHA) Handbook updates the procedures for planning and activating new Department of Veterans Affairs (VA) Community-based Outpatient Clinics (CBOCs) and establishes consistent planning criteria and standardized expectations for CBOC operations.
- **2. SUMMARY OF CHANGES:** This VHA Handbook establishes consistent planning criteria and standardized expectations for CBOC operations.
- 3. RELATED ISSUES. None.
- **4. RESCISSIONS:** VHA Directive 2001-060 is rescinded.
- **5. FOLLOW-UP RESPONSIBILITY:** The Deputy Under Secretary for Health for Operations and Management (10N) is responsible for the contents of this Handbook. Questions may be addressed to 202-273-5841.
- **6. RECERTIFICATION:** This VHA Handbook is scheduled for recertification on or before the last working day of April 2008.

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### PLANNING AND ACTIVATING COMMUNITY-BASED OUTPATIENT CLINICS

### 1. PURPOSE

This Veterans Health Administration (VHA) Handbook updates the policy for planning and activating new Department of Veterans Affairs (VA) Community-based Outpatient Clinics (CBOCs) and establishes consistent planning criteria and standardized expectations for CBOC operations.

### 2. BACKGROUND

- a. Over the past 8 years, VHA has transitioned from a hospital bed-based system of care to a more effective system rooted in ambulatory and primary care. CBOCs are an important component of the VA health care delivery system.
- b. A CBOC is a health care site (in a fixed location) that is geographically distinct or separate from the parent medical facility. A CBOC can be a site that is VA-operated and/or contracted. A CBOC must have the necessary professional medical staff, access to diagnostic testing and treatment capability, and referral arrangements needed to ensure continuity of health care for currently and potentially eligible veteran patients (see par. 6).
- c. Since 1995, VHA has activated over 450 new CBOCs to more efficiently and effectively serve eligible veterans and provide care in the most appropriate setting. Recent evaluations show CBOCs to be effective in improving access to health care services for veterans and providing high quality care in a cost-effective manner. This Handbook retains the Network as the focal point for CBOC planning, allowing decisions regarding needs and priorities to be made in the context of local market circumstances and veteran preferences, but creates minimum uniform criteria and standards to ensure consistency nation-wide.
- d. Establishment of clinics is subject to the development of CBOC business plans and application of National CBOC criteria, the appropriate VA Central Office approval and notification of Congress, the availability of funds within the Veterans Integrated Service Network (VISN), and applicable Federal statutes and VA regulations.
- e. CBOCs are operated in a manner that provides veterans with consistent, safe, high-quality health care, in accordance with VA policies and procedures.
- f. The current legislative authorities relevant to establishing CBOCs are outlined in Paragraph 7. The Veterans' Health Care Eligibility Reform Act, Public Law 104-262, provides significantly enhanced sharing authority to VHA. This legislation authorizes VA to obtain health care resources by entering into contracts or other agreements with any health care facility, entity, or individual. Generally speaking, this authority may now be used to contract for primary care and/or for a CBOC.

#### 3. RESPONSIBILITIES

- a. <u>Under Secretary for Health.</u> The Under Secretary for Health is responsible for establishing national standards and guidance regarding CBOC planning, approval, implementation, ongoing monitoring, and operations.
  - b. **VISN Director.** The VISN Director is responsible for:
- (1) Planning and establishing CBOCs to provide veterans with quality health care in the most appropriate setting. Specifically, CBOC planning must be undertaken to meet the following National goals, i.e., to:
- (a) Improve access to current users by placing CBOCs in those areas where current users travel significant distances and/or endure excessive travel time to access care.
- (b) Improve equity of access to veterans by targeting underserved areas with low Priority 1-6 market penetration. *NOTE:* Public Law 104-262 requires VA to manage enrollment of veterans in accordance with a series of priorities. The priority levels range from 1-8, with level 1 being highest priority for enrollment. The same services are available to all enrolled veterans.
  - (c) Improve efficiency and cost-effectiveness of operations.
  - (d) Increase patient satisfaction by increasing access to services and reducing waiting times.
- (2) Developing strategic plans for the delivery of health care services to veterans, including CBOCs, through the annual Strategic Planning process, as well as the Capital Asset Realignment for Enhanced Services (CARES) process. Network strategic plans are to be based on:
- (a) Network-wide analyses of current and projected veteran demographics. A Network-wide analysis determines relative priorities and identify areas where there is evidence of the greatest need. **NOTE:** Plans to establish new clinics should be referenced in the annual Network strategic plan and financial plan. It is not a requirement to specifically identify individual sites or name the town of the new location in the annual plan; a general description of the proposed location (i.e., county or contiguous counties) is sufficient.
  - (b) Current and projected utilization patterns.
- (c) CARES-related data. **NOTE:** As Networks undergo the CARES process, markets with gaps in access and outpatient workload will be identified and CBOCs could become solutions to those gaps as a part of the approved CARES Market Plans.
- (d) Analysis of the impact of proposed sites upon existing sites of care, including those sites outside the VISN boundaries. *NOTE:* VISNs may undertake joint clinic initiatives to serve veteran populations residing in areas near the boundaries between two VISNs. Proposals that would locate new clinics across boundaries or in close proximity to a VISN border, must be agreed to by each affected VISN Director and documentation of such an agreement must be

submitted with the CBOC business plan.

- (3) Utilizing the following VHA National CBOC Criteria (see Att. A) for planning and prioritizing new CBOCs. *NOTE:* Criteria is reviewed annually and modified to be consistent with VHA Strategic Goals and Objectives. These criteria address the:
- (a) Distance of proposed site from existing VHA primary care sites needs to be consistent with CARES travel times. The proposed site should not be closer than 30 minutes from an existing primary care site.
- (b) Number of current Priority 1-6 users in the proposed market area (1,300 users in a 3-year period).
- (c) Priority 1-6 market penetration in the proposed market area (below 25 percent). Priority 1-6 veteran population of the market area for the proposed CBOC (greater than national average of 29 percent).
- (d) Unique considerations present (e.g., manpower shortage areas, targeted minority veteran populations, geographic challenges).
- (e) Strength of the overall business plan (e.g., analysis of need, appropriate use of data, appropriate services for population to be served, etc.).
  - (f) Resources and cost effectiveness of proposed site.
- (g) Impact on primary care and specialty care waiting times at the parent or closest VHA facility.
- (h) Identification as a geographic area facing an outpatient access or outpatient workload gap through the CARES process.
- (4) Developing business plans for CBOCs and submitting those plans for VA Central Office approval and Congressional endorsement. CBOC business plans must be submitted even if the proposal would be under a VA-Department of Defense (DOD) sharing arrangement or if new primary care services are being added at an existing Vet Center. *NOTE:* Questions concerning sharing of current VA space may be directed to the CAMPS Office (182C) and all other questions related to enhanced sharing authority for health care resources may be directed to the VHA Medical Sharing Office (176B). At a minimum, the following data elements must be addressed within the business plan using the required format (see Att. B):
- (a) A general description of the rationale for establishing the CBOC and the outcomes to be achieved.
- (b) A discussion and analysis of the alternatives that were considered in establishing the CBOC (including descriptions of the cost effectiveness of each alternative considered).
- (c) A detailed target market analysis and proposed workload projections for the CBOC. This must include new and existing users to the clinic and a breakdown of users by priorities (1-6 and

7-8).

- (d) A description and/or listing of the major types of medical and non-medical health care services to be provided.
  - (e) An analysis of the target population's mental health care needs.
- (f) A discussion of the funding available to support the CBOC, including the VISN's ability to ensure the facility can maintain services given current budget scenarios.
- (g) A listing and description of the full-time equivalent (FTE) staffing that will be allocated to support the CBOC and enable it to meet panel sizes and timeliness standards.
- (h) A comprehensive listing and description of estimated clinic costs, including both start-up and recurring costs.
  - (i) An analysis of the CBOC's impact on primary care waiting times at the parent facility.
  - (i) An analysis of CBOC's impact on specialty care waiting times at all referral sites.
- (k) A contingency plan for how resource needs will be met, or workload limited, should new workload substantially exceed what was projected.
  - (l) A description of stakeholder involvement and input.
- (m) An implementation plan, with timelines, for implementing the CBOC once the proposal is approved.
- (n) A description of how the Network will evaluate, on a regular basis, whether the CBOC is achieving its overall goals and objectives.
- (5) Funding CBOCs entirely from resources available to the facility or Network, while maintaining capacity for specialized programs and long-term care services. It is recognized that "new users" are inevitable when a new CBOC is activated. This being the case, caution needs to be exercised when planning for additional CBOCs in view of VA's constrained resources.

### 4. APPROVAL PROCESS

- a. A business plan to establish a CBOC must be developed by the VISN in accordance with the format and data elements listed in Attachment B . A finalized lease or sharing agreement is not required prior to CBOC approval. However, the business plan must reflect the intent to comply with the legislative and policy requirements pertaining to the acquisition of leased space using applicable Federal procurement regulations as well as VA policies and procedures.
- b. The business plan and summary (electronic copies must be available), in the formats delineated in Attachments B and C, are submitted to the Deputy Under Secretary for Health for Operations and Management, who is responsible for coordinating VA Central Office review and application of National criteria, as follows:

- (1) The Office of the Deputy Under Secretary for Health for Operations and Management reviews all CBOC business plans for adherence to policy and format, and coordinates the technical review by General Counsel and the Office of Asset Enterprise Management (OAEM).
- (2) The Office of the Deputy Under Secretary for Health for Operations and Management convenes a review panel on a quarterly basis for the purpose of applying the national criteria (see Att. A) and recommending CBOC business plans for approval to the Deputy Under Secretary for Health for Operations and Management. The review panel consists of a representative from the offices of: the Deputy Under Secretary for Health for Operations and Management, the Office of Policy and Planning (OP&P), the Office of Patient Care Services, the Chief Financial Officer (CFO), a Network Planner, and a Network Clinical Manager or CBOC Coordinator, or their designees.
- (3) Clinics that are approved by the review panel are presented to the National Leadership Board by the Deputy Under Secretary for Health for Operations and Management. If the National Leadership Board concurs, the Office of the Deputy Under Secretary for Health for Operations and Management prepares the CBOC package for notification of the House and Senate Appropriations Subcommittees. *NOTE: Consistent with past practice, proposals are sent to OAEM for forwarding to the Appropriations Subcommittees for final clearance.* The Office of the Deputy Under Secretary for Health for Operations and Management notifies the Network regarding completion of the process and, if Congressional comments are offered, confers as necessary, with the Under Secretary for Health and appropriate Network Director.
- (4) Final documents are subject to VA Central Office review under established regulations, including any proposed agreements to acquire the use of space or health care services above the applicable dollar thresholds, are submitted for approval (see par. 7). In general, non-competitive sharing agreements below \$500,000 (including all option years) and competitive sharing agreements below \$1.5 million (including all option years) may be executed without prior legal and technical review by VA Central Office. Regional Office must review sharing agreements below these dollar thresholds. Copies of all executed sharing agreements must be sent to the Medical Sharing Office (176) within 5 days of final signature.

### 5. MONITORING AND EVALUATION PROCESS

- a. Networks are responsible for the on going monitoring of CBOCs and ensuring that consistent, quality care is delivered according to VA regulations, policies, and procedures. Networks are responsible for evaluating whether CBOCs are meeting their business purposes and overall goals and objectives.
- b. The Office of Quality and Performance (OQ&P) provides feedback on CBOC performance annually with regards to Clinical Indicators as:
  - (1) Patient Satisfaction Surveys,
  - (2) Preventive Care, and
  - (3) Clinical Guidelines.

**NOTE:** Results of these surveys are made available through the OQ&P web page at <a href="http://vaww.oqp.med.va.gov/">http://vaww.oqp.med.va.gov/</a> and must be incorporated into the Network performance management system.

- c. The Deputy Under Secretary for Health for Operations and Management is responsible for developing a set of monitors (available on the VISN Support Service Center (VSSC) web page at: <a href="http://vssc.med.va.gov">http://vssc.med.va.gov</a>) for evaluating CBOC progress in the following areas:
  - (1) Number of visits.
  - (2) Number of primary care and mental health encounters.
  - (3) Unique veterans treated.
  - (4) Unique veterans treated who are new to the system.
  - (5) Unique veterans treated by priority level (1-6 and 7-8).
  - (6) Waiting times.
  - (7) CBOC costs (Decision Support System (DSS)).

**NOTE:** These monitors will be enhanced over time, as additional data becomes available. The Deputy Under Secretary for Health for Operations and Management reviews CBOC performance and monitors with the Networks on a quarterly basis through the Network Performance Review process.

- d. In the process of evaluating CBOC performance, Networks may decide not to open a planned clinic or to close an operating clinic.
  - (1) Reasons for this decision might include:
- (a) Ability to accommodate veterans from the service area at a different community-based site,
  - (b) Inability to contract for care in the community, and/or
  - (c) Inability to acquire adequate staffing or site accommodations.
- (2) Prior to a decision not to activate or deactivate a CBOC, Networks must submit a brief justification to the Deputy Under Secretary for Health for Operations and Management providing an explanation, rationale, and summary of stakeholder comments.
- (3) Based on the information provided in the justification, a report is submitted by the Under Secretary for Health through the VA Budget Office and OAEM to the Appropriations Committees for notification, prior to Network action.

**NOTE:** Subsequent to receiving approval, Networks must submit a formal request to deactivate the clinic station number.

# 6. MINIMUM STANDARDS FOR COMMUNITY-BASED OUTPATIENT CLINICS (CBOC) OPERATIONS

Veterans receive one standard of care at all VHA health care facilities; care at CBOCs must be consistent, safe, and of high quality, regardless of model (VA-staffed or contract). CBOCs are expected to comply with all relevant VA policies and procedures, including those related to quality, patient safety, and performance. The following outlines specific requirements that must be met at CBOCs:

- a. <u>Services.</u> The scope of service at CBOCs varies, based on the type of clinic and population served. At a minimum, CBOCs must provide primary care and mental health services, depending upon the number and needs of veterans in the designated service area.
- (1) **Primary Care Services.** At a minimum, Primary Care services provide intake, initial assessment, health promotion (screening and counseling), disease prevention, management of acute minor illnesses and chronic bio-psychosocial conditions, pharmacotherapy management, physical examinations, primary care women's health, injections and immunizations, referrals for specialty, rehabilitation, and other levels of care, follow-up, overall care management, and patient and caregiver education.
- (2) **Mental Health Services.** Mental Health Clinics, at a minimum, provide ability to screen for mental disorders and make mental health diagnosis, pharmacotherapy, psychotherapy and/or psychosocial counseling for mental health disorders, referral for inpatient or residential care, direct care, or access to consultation for special emphasis and/or complex problems (e.g., Post-traumatic Stress Disorder (PTSD)), prevention, screening, and patient and/or family education.
- **NOTE:** The provision of other specialized medical or mental health services at a CBOC depends on the size and needs of the population served. The mechanism by which these services are provided depends on various considerations including the: type of contract arrangements, availability of qualified VA staff, and the geographic location and VA's ability to hire specialists in that location. The parent facility must have the capability to provide necessary backup support for the CBOC and referral mechanisms for specialty care.
- b. **Staffing.** CBOCs must be staffed to address projected patient demand. CBOCs are to be structured and managed through primary care panels.
- c. **Quality Management.** One standard of care must be maintained at all VHA health care facilities, including CBOCs. The quality of care expected is independent of the model, site, or provider (i.e., VA-staffed or contracted care). At a minimum, CBOCs must be incorporated into the parent facility's Quality Management Program, which includes analyses of care at CBOCs and Credentialing and Privileging. Identified quality of care issues are addressed through the facility's Quality Management Program. VA-staffed CBOCs must meet the standards of the Joint Commission on the Accreditation of Healthcare Organizations (JCAHO); and contract clinics must meet the quality standards established by the VHA Logistics Office (176), and the Office of Patient Care Services (11).

- d. <u>Emergencies.</u> Each CBOC must have a local policy or standard operating procedure defining how health emergencies are handled, including mental health emergencies. CBOCs must maintain appropriate emergency response capability. Parent facilities are responsible for making a determination as to the type of equipment (e.g., a crash cart, Automatic External Defibrillators (AED)) that need to be located at the CBOCs sites through their standing Code or Cardio-pulmonary Resuscitation Committees. CBOCs that do not have Advance Cardiac Life Support trained providers, appropriate supplies, and a Code team, are required to have an AED at their site.
- e. <u>Timeliness.</u> CBOCs must meet VHA facility timeliness goals in accordance with current VHA policy.
- f. <u>Performance Measures</u>. CBOC visits are included in the quarterly data and/or abstraction process that supports VHA's Performance Measurement Program (PMP). CBOC patients are to be included in National and local patient satisfaction surveys.
- g. <u>Patient Safety.</u> Adverse events at CBOCs must be reported to the parent facility's patient safety officer or risk manager; they must be disseminated through the patient Safety Reporting System to the Network and the National Patient Safety Center in Ann Arbor, MI, as outlined in the National Center for Patient Safety Handbook (see the following website <a href="http://vaww.va.gov/direc/health/publications.asp?publ+handbook&order=Issues&dir=descorped}">http://vaww.va.gov/direc/health/publications.asp?publ+handbook&order=Issues&dir=descorped</a>
- h. <u>Station Numbering.</u> CBOCs are required to have a unique five-digit station identifier for workload reporting purposes. In accordance with VHA policy, the Office of the Deputy Under Secretary for Health for Operations and Management requests assignment of new station numbers at the time that CBOCs are approved, and the parent facility requests activation of the assigned station number at least 30 days prior to the opening of the clinic.
- i. <u>Workload Reporting.</u> All workload that occurs at CBOCs is entered in the Veterans Health Information System and Technological Architecture (VistA) databases and submitted to the Austin Automation Center (AAC) utilizing the CBOCs five-digit station identifier. As appropriate, based on available services, laboratory, pharmacy, and radiology packages are to be set up for the CBOC. CBOCs must utilize the Computerized Patient Record System (CPRS) to the maximum potential.
- j. <u>Cost Accounting.</u> All CBOC costs are to be reported through the Decision Support System (DSS); CBOCs need to be set up as separate departments in both the Account Level Budgeter (ALBC) and in the Department Cost manager (DCM). *NOTE:* As Core financial Logistics System (FLS) is developed, CBOC cost accounting needs to seamlessly transition into new cost accounting systems.
- k. <u>Accessibility.</u> CBOCs must comply with the statutes and regulations applicable to veterans with disabilities, including special patient populations (e.g., the Americans with Disabilities Act).

- l. <u>Regulatory and Accrediting Standards.</u> CBOCs must comply with relevant regulatory and accrediting standards with respect to general environmental safety including the Office of Safety and Health Administration (OSHA) and JCAHO.
- m. <u>Patient Complaints.</u> Veterans and their families that receive care at a CBOC must have their complaints addressed in a convenient and timely manner in accordance with VHA Directive 1050.2. Response to complaints occurs as soon as possible, but no longer than 7 days after the complaint is made. All patient complaints must be entered in the National Patient Complaint database.
- n. <u>Contracting.</u> CBOC contracts must meet VHA requirements as outlined by the VHA Logistics Office (176) and the Office of Patient Care Services (11).

# 7. LEGAL AUTHORITIES FOR ESTABLISHING COMMUNITY-BASED OUTPATIENT CLINICS

- a. <u>Contracting With Non-VA Health Care Providers.</u> CBOCs may be established by entering into sharing agreements or contracts with non-VA health care providers to provide certain services to eligible VA beneficiaries. The statutes authorizing such sharing agreements or contracts have specific limitations which are discussed as follows:
- (1) **Title 38 United States Code (U.S.C.) § 8153.** *NOTE:* This statute authorizes the VA to obtain health care resources by entering into contracts or other agreements with any health care provider, other entity, or individual. This is a broad authority that, in general terms, may be used to contract for professional services alone, or for a comprehensive practice including the physical plant in which the services are provided, e.g., CBOC.
- (a) The term "health care resource" includes hospital care and medical services (as those terms are defined in 38 U.S.C. Section 1701), any other health care service, and any health care support or administrative resource, as well as medical equipment and space.
- (b) The term "health care providers" includes health care plans and insurers and any organizations, institutions, other entities, or individuals who furnish health care resources.
- (c) Health care resources may be obtained from any health care providers. To the extent that the resource is obtained from an institution affiliated with the Department in accordance with 38 U.S.C. Section 7302, including medical practice groups and other entities associated with affiliated institutions, it may be obtained on a sole-source basis. *NOTE:* However, to the extent that the resource is obtained from a source other than an affiliate or an entity associated with an affiliate, competition must be obtained unless an adequate sole-source justification exists (see VHA Directive 1660.1).
- (2) **Title 38 U.S.C. § 7409.** *NOTE:* This statute authorizes VA to enter into contracts with schools and colleges of medicine, osteopathy, dentistry, podiatry, optometry, and nursing, and clinics and/or any other group or individual capable of furnishing scarce medical specialist services to VA facilities

- (a) The services must be provided <u>in</u> a VA facility. Consequently, this authority cannot be used to enter into agreements to establish CBOCs using the facilities of the provider with whom VA intends to contract.
- (b) Because of the greater flexibility provided under 38 U.S.C. Section 8153, VHA facilities need to consider using this authority instead of that in 38 U.S.C. Section 7409, to obtain the services of scarce medical specialists.
- (3) **Title 38 U.S.C. § 8111.** *NOTE:* This statute authorizes VA to enter into agreements with DOD for the sharing of health care resources.
- (a) These agreements may be used to establish CBOCs at DOD facilities using DOD personnel, VA personnel, or a combination of DOD and VA personnel.
- (b) The term "health care resource" is broadly defined by the statute to include hospital care, medical services, rehabilitative services and "any other health care service, and any health care support or administrative resource." Under this statute, it is possible to provide virtually any kind of health care at CBOCs, including primary care.
- (c) Reimbursement must be based upon a flexible methodology that takes into account local conditions and needs and the actual costs to the providing agency.
- (d) Proposed agreements must be submitted for approval to the Under Secretary for Health and the Assistant Secretary of Defense for Health Affairs. *NOTE:* Such proposals become effective on the 46th day after receipt by either official, unless it is approved or disapproved at an earlier date.
- b. <u>Establishing VA-Operated CBOCs.</u> VA may establish a new outpatient presence by placing VA employees at approved CBOC locations. These locations may be either VA-leased space or VA-owned space.
- (1) **Authority for Acquisition of CBOCs by Lease.** All proposed CBOCs are considered "medically related space" and must be funded locally. Space must be acquired in accordance with all applicable Federal laws and regulations, as well as VA Directives and procedures, to include, but not limited to, Veterans Affairs Acquisition Regulations and VA Directive 7815.

## (2) Acquisition of CBOC by Sharing Agreement

(a) <u>Authority.</u> All proposed CBOCs are considered "medical space" and must be funded locally. Space can be acquired, on a very limited basis, through a competitive sharing agreement or through a non-competitive sharing agreement with an affiliated medical school.

### (b) Procedure

1. The Sharing Authority under 38 U.S.C. Section 8153 is <u>not</u> to be used to acquire space for a CBOC, unless the term is for less than 6 months and is the space required while a lease is being finalized. Sharing authority does not provide VA sufficient property protections to operate a

medical clinic and is <u>only</u> to be used as a temporary solution. If space requires minimal special purpose alterations, facilities are <u>restricted to using non-reoccurring maintenance (NRM) funds only</u> for any renovations to space under a sharing agreement. If minor or major construction funds are required then a lease is the required option.

<u>2</u>. All sharing agreements under \$500,000 over the term of the agreement must receive the review and concurrence of Regional Counsel. All sharing agreements awarded non-competitively over \$500,000 and awarded competitively over \$1.5 million must be reviewed and approved by VA Central Office, including the Medical Sharing Office, Acquisitions and Material Management, Office of General Counsel, and the Office of Patient Care Services.

### 8. REFERENCES

- a. VA Circular 00-90-22.
- b. M-1, Part I, Chapter 34, Section II, Change 34.

# VHA HANDBOOK 1006.1 APPENDIX A

Proposals that receive tweleve or more points arew recommended to the Policy Board for approval. Proposals that do not receive a pass in item (1) will nor br recommended for approval, regardless of how many points are received.

Criteria	Points and/or Formula	Total Points Available
(1) Overall strength of the Community-based Outpatient Clinic (CBOC) proposal (e.g., proposal demonstrates analysis of need and alternatives and includes appropriate services given the population to be served; proposal includes appropriate data sources and planning methodologies and/or projections to determine veteran utilization and workload. Demonstrates sufficient veteran population to support clinic in the out years).	Pass (P) or Fail (F) If proposal receives F, it will not be approved	N/A
(2) A minimum distance of 30 minutes from existing Veterans Health Administration (VHA) primary care site	Yes = 2 $No = 0$	2
(3) Number of current Priority 1-6 (P1-6) users (seen in the Department of Veterans Affairs (VA) system in previous 3 complete fiscal years) from proposed market area = 1,300 and/or number of P1-6 enrollees = 1,600	Yes = 2 No = 0	2
<ul> <li>(4) a. P1-6 market penetration is 25 percent or lower, as defined by:</li> <li>P1-6 current users ( seen in the VA system in the previous 3 complete fiscal years (FYs)) from defined market area, divided by the P1-6 veteran population.</li> <li>b. P1-6 veteran population is 29 percent or more of total veteran population</li> </ul>	a. Yes =1 No=0 b. Yes =1	2
of the market area for the proposed CBOC	No=0	
(5) Unique demographic and geographic considerations such as: targeted minority veteran populations (e.g., Native Americans, African Americans. etc), mountainous or desert area, bodies of water, low population density, medically underserved or health manpower shortage area.	Yes = 1 No = 0	1
6) Proposed CBOC location in geographic area identified for a CARES PI based on: (a) limited access to outpatient care OR (b) increased future demand for outpatient care.	Yes = 2 $No = 0$	2
(7) Veterans Integrated Service Network (VISN) requested a budget supplement in current fiscal year.	Yes = (-2) $No = 0$	0
(8) Cost effectiveness as measured by:  a. Total additional costs to be absorbed with the establishment of a CBOC have been listed and are judged to be reasonably accurate;  b. A specific plan has been provided concerning redistribution of resources to implement and operate the CBOC; and  c. The most cost-effective alternative to establish and provide care in the CBOC has been chosen.	a. Yes= 1 No=0  b. Yes=1 No=0  c. Yes=1 No=0	3
(9) Backlog reductions: Primary Care	a. Yes= 1 No=0	3
<ul> <li>a. The average primary care waiting time at parent facility &gt;30 days.</li> <li>b. Parent facility operates at or above capacity (as measured by average panel sizes-1200 for MD and 800 for non-MD)</li> <li>c. 10 percent or more of primary care patient workload at the parent facility</li> </ul>	b. Yes=1 No=0	
comes from the proposed CBOC market area	c. Yes=1 No=0	
10. Specialty Care a. The average specialty care waiting times for three out of five specialty clinics targeted by VHA National Performance measures (audiology, cardiology, eye care, orthopedics, and urology) at facilities that will receive referrals >30 days	a. Yes=(-1) No=0	1
b. The CBOC provides specialty care that addresses long waiting times at parent facility or referral sites (>30 days next available for that specialty)	b. Yes = 1 No=0	A-1

### APPENDIX B

# REQUIRED BUSINESS PLAN FORMAT FOR PROPOSED COMMUNITY-BASED OUTPATIENT CLINIC (CBOC)

1.	CLINIC PROPOSED BY: VETERANS INTEGRATED SERVICE NETWORK (V	/ISN)
#_		

- **2. FOR FURTHER INFORMATION CONTACT.** (Name, address, telephone and fax number of person(s) to contact for additional information. The designated person(s) needs to be able to answer specific questions about the proposal.)
- **3. PROPOSED CLINIC LOCATION.** The proposed location such as county, town or city. *NOTE:* A specific street location should not be given because this implies pre-selection of the site. If a proposal addresses more than one site, each site must be specifically identified.

## 4. DISTANCE IN MINUTES FROM NEAREST PRIMARY CARE SITE

- a. Distance from nearest primary care site to proposed site should be reported using Capital Asset Realignment for Enhanced Services (CARES) travel and/or access standards. The data source needs to be specified and attention paid to the VHA national criteria on minimum driving distances.
- b. Identify closest Department of veterans Affairs (VA) sites (either within or outside Network) and discuss the impact of proposed clinic on these sites.

# 5. BUSINESS PURPOSES, GOALS, AND EXPECTED OUTCOMES FROM ACTIVATING THIS CBOC.

- a. Is the catchment area where the proposed CBOC is to be located part of a Market that was identified by CARES as requiring a Planning Initiative due to a gap in Access or Outpatient workload? **NOTE:** A list of CARES Planning Initiatives can be found at Veterans Integrated Service Network (VISN) Support Service Center (VSSC) CARES Portal at <a href="http://vssc.med.va.gov/">http://vssc.med.va.gov/</a>.
- b. Provide a general description of the rationale for establishing the clinic and the outcomes to be achieved. Describe <a href="https://www.ncbe.com/how-the-cbock-now-th

# 6. DISCUSSION AND ANALYSIS OF ALTERNATIVE APPROACHES TO DELIVERING NEEDED SERVICES

- a. Describe why current VA assets cannot accommodate the needs of veterans who reside in this service area. Describe in specific terms what alternatives were considered. For each option, list the specific pros and cons and provide a summary of cost comparisons for each alternative considered. If the proposal is for a capitated contract clinic, explain how the estimated rate was determined. State the preferred alternative and why it was selected.
- b. In describing each option, summarize the following CBOC costs (use example tables and components in par. 9) and workload for the first full year of operation:
  - (1) Non-recurring start-up costs (amortize costs over the term of the lease),
- (2) Total recurring costs to include salary and benefits (VA-staffed model only), VA-leased space, on-site ancillary services or local contract costs, all-inclusive contractual services (contract model), and all other recurring costs,
  - (3) Projected unique users if different for the alternatives proposed.

**NOTE:** This is an evaluation factor for cost-effectiveness. The proposal needs to demonstrate that the most cost-effective alternative is the proposed option.

- **7. DEMOGRAPHIC ANALYSIS AND/OR PROJECTED WORKLOAD.** Discuss target market analysis and proposed workload projections for the CBOC. At a minimum, the following data and information needs to be identified (additional data elements can be provided where useful):
- a. Proposed primary service area, i.e., county(ies), or zip code area(s) to be served by CBOC. Primary service areas need to generally encompass no more than a 30-minute radius from the proposed CBOC site; in rural areas, this can reasonably be increased to a 60-minute radius.
- b. Demographic data for proposed service area (e.g., current veteran population and a 5-year population projection, age distribution of veterans, income and/or economic factors, proximity to parent facility or major cities, transportation issues, etc.)
- (1) Demographic data is available on the following Planning Systems Support Group (PSSG) web page: (<a href="http://vaww.pssg.med.va.gov/datamenu.asp">http://vaww.pssg.med.va.gov/datamenu.asp</a>)

# (2) Format Table 7b.

Current and Projected Veteran Population	County A or Zip Code Area A	County B or Zip Code Area B
2002		
2003		
2004		
2005		
2006		
2007		
2012		
Age Distribution: $0-44$	%	%
45 – 64	%	%
<u>≥</u> 65	%	%
Gender: Male	%	%
Female	%	%

- c. <u>Market Penetration Analyses.</u> Provide current veteran market penetration (number of users from last 3 complete Fiscal Years (Fys) divided by the veteran population = percentage of market penetration) within proposed service area.
- (1) This data is available on the PSSG web page at <a href="http://vaww.pssg.med.va.gov/datamenu.asp">http://vaww.pssg.med.va.gov/datamenu.asp</a> (for total users and veteran population by county) and <a href="http://vssc.med.va.gov">http://vssc.med.va.gov</a> (for facility users by county).
  - (2) Format Table 7c1.

County, or	Total Unique	Total	Total 3 year	Parent	Total 3 year
Zip Code	VA Users (last	Veteran	Market	Facility	Parent Facility
Area	3 FYs)	Population	Penetration	Users (last 3	Market
		Latest FY		FYs)	Penetration
County A			%		%
County B			%		%
Total			%		%

- (3) Provide the number and percent of veteran population users by priority level.
- (a) These data are available on the PSSG webpage <a href="http://vaww.pssg.med.va.gov/datamenu.asp">http://vaww.pssg.med.va.gov/datamenu.asp</a> (for total veteran population by priority group )

(b) Format **Table 7c2**.

Priority Group	Total VA Users by Priority	Total Veteran	Market
	Group	Population By Priority	Penetration
		Group	
1-6			%
7-8			%
Total (Priority			
1-8)			

- d. <u>User and Visit Data.</u> This paragraph needs to describe how many veterans will be served at the CBOC and what the anticipated visit workload will be. 'Existing veterans' (uniques) to be re-directed from parent facility as well as projected 'new veterans' should be included. In addition, the number of visits expected (visits and/or unique) should be documented. Segment projected workload by new and existing unique users, and by priority level (1-6 and 7-8).
- (1) As a guideline, the targeted increases need to be based on experience for CBOCs nationally (for reference see Historical Priority User Group Information Report located at <a href="http://152.125.187.140:8081/planning/Docs/Historical%20CBOC%20Information.xls">http://152.125.187.140:8081/planning/Docs/Historical%20CBOC%20Information.xls</a>) or within the VISN to date.
- (2) CARES utilization projections for the counties that will be included in the CBOC market area also need to be factored in to the workload estimates. **NOTE:** This data is available on the VSSC CARES Portal at http://vssc.med.va.gov
- (3) Show workload (both unique users and visits), projected for a 3-year period, in a table similar to the one following, and explain the methodology used.

Format Table 7d.

	Start-up Year, or First Year	Second Year	Third Year
Total Existing Users			
a. Priority Group 1-6 b. Priority Group 7-8			

	Start-up Year, or First Year	Second Year	Third Year
New Users  b. Priority Group 1-6 c. Priority Group 7-8			
a. Priority Group 1-6 b. Priority Group 7-8			
Total Visits			

**NOTE:** As a guideline, annual primary care visits per unique patient generally average three to three point five visits per unique. For CBOCs with basic mental health services available on site, visits per unique patient average four to five visits per unique patient.

e. <u>Waiting Times Analysis.</u> For the parent facility and, if applicable, the other closest facility to the proposed CBOC, provide the current primary care and specialty care waiting times, as well as primary care capacity (refer to web page: <a href="http://vssc.med.va.gov">http://vssc.med.va.gov</a>). Identify the percentage of patients seen at the facility that live in the CBOC catchment area:

### (1) Table 7e1. Primary Care Waiting Times

Facility Name:	Average Primary Care (PC) Waiting Times	% PC capacity	% of PC patients who live in CBOC catchment area
Facility A			
Facility B			
Facility C			

### (2) Table 7e2. Speciality Care Waiting Times

Facility*	Average Specialty Care Waiting Times				
	Audiology	Eye	Urology	Cardiology	Orthopedics
Facility A					
Facility B					
Facility C					

<sup>\*</sup>Include all referring facilities

Data Source: Waiting Time Data can be obtained at the VSSC website at http://vssc.med.va.gov/

### f. Designations and/or Unique Considerations.

- (1) Indicate whether this proposal is targeted to meet:
- (a) The needs of underserved minority populations (e.g., Native Americans, African-Americans, etc.), and
- (b) Targets veterans living in an officially designated Health Professional Shortage Area (refer to web page: http://bphr.hrsa.gov/shortage/, or a 'medically underserved' area based on other factors (e.g., population to physician ratio, percentage of people below poverty line, percentage 65 and older, and relative infant mortality rate).
- (2) Describe the targeted minority veteran population (e.g., percentage of minority veteran population that will be served by the CBOC).
- (3) Describe any other unique demographic and/or geographic considerations (mountainous or desert area, bodies of water, low population density, etc). *NOTE:* Attach maps if applicable.

#### 8. DESCRIPTION OF SERVICES TO BE PROVIDED

## a. Scope of Services

- (1) List types of medical (e.g., primary care, mental health services, pharmacy, electrocardiogram (EKG), etc.) and non-medical (e.g., social work, benefits counseling, etc.) health care services to be provided in this CBOC.
- (2) Include a description of how access to ancillary services (laboratory, x-ray, pharmacy, etc.) will be provided, as well as specialty and consultative services if they will not be provided at the CBOC.
  - (3) Discuss the lines of authority and/or accountability for the clinic operation.
  - (4) Describe the referral relationship between this CBOC and its "parent" medical center.
- (5) Include a discussion of how the CBOC will handle after hours and emergency care in accordance with VHA policy.

**NOTE:** It would be helpful to show what both VA and the Contractor will provide. This section needs to be very specific about how services such as x-ray, laboratory, pharmacy, mental health, etc., will be provided.

b. <u>Mental Health Service Assessment.</u> Fully address how access to mental health services will be provided. Veterans seen at CBOCs needs to have a convenient means for accessing mental health services if needed. In support of providing (or not providing) on-site mental health services, report results of the Network's Mental Health Needs Assessment Template, as needed.

## c. Specialty Care Needs Assessment

- (1) Describe how specialty services will be provided at the CBOC.
- (2) Discuss how the provision of specialty services at the CBOC will address backlogs at referral facilities.

# d. Quality of Care Monitoring

- (1) Specifically address how CBOC quality of care will be monitored on a continuing basis (i.e., process to be used).
  - (2) Ensure that one standard of care is exhibited throughout the system.

### 9. CLINIC COSTS

# a. VISN Capacity for Funding of CBOC

- (1) Address the ability of the VISN to fund the CBOC within existing resources.
- (2) Indicate whether your VISN has requested a budget supplement in the previous or current fiscal year.
- (3) Specify, as precisely as possible, the sources of funds and Full-time Equivalent (FTE) that will be used at the CBOC, and how CBOC costs will be absorbed in light of resource constraints. If new workload is anticipated, describe the planned approach to deal with this increased cost.

### b. Staffing and/or Projected Workload

- (1) Identify staffing (by number and type) in recurring cost Table 9d.2.
- (2) Address in table and narrative format how:
- (a) Staffing will meet the projected workload,
- (b) FTE will be modified should workload be higher than anticipated, and
- (c) Staff absences will be covered. *NOTE:* Clinical provider FTE (i.e., physicians, nurse practitioners, physician assistants) should reflect VHA panel size guidelines.
- c. <u>Specialized Treatment and Rehabilitative Needs of Disabled Veterans</u>. Address the potential impact of the proposed CBOC on the parent facility's ability to maintain capacity for the Specialized Treatment and Rehabilitative Needs of Disabled Veterans. Implementation of the CBOC must not draw resources away from this commitment.
- d. The following annual costs need to be included and portrayed in tabular form for the start-up year and the next 2 full fiscal years. *NOTE:* Use these tables to provide information for each alternative considered and/or discussed in paragraph 6 of the business plan):

Table 9d.1 Non-recurring or Start-up Costs. List in year the cost occurs. Provide details

regarding any capital costs.

arang any capital costs.			
	Start-up Year	Year 2	Year 3
(1) Construction, purchase, or			
renovation of space	\$	\$	\$
(2) Equipment			
a. Clinical			
b. Computer			
c. Telecommunication			
(3) Furnishings			
(4) PCS Moving Expense			
(5) Miscellaneous (specify if			
any single item is over \$10,000)			
Total non-recurring costs			
	\$	\$	\$

**Table 9d.2 - Recurring Costs** 

	Start-up Year	Year 2	Year 3
(1) Salary cost, including	-		
benefits (total for VA-staffed			
model)			
(2) Real Property Lease			
(annual cost for VA-leased			
space)			
(3) *Additional radiology cost			
(done at or for CBOC including			
contract)			
(4) *Additional laboratory cost			
(done at or for CBOC including			
contract)			
(5) *Additional pharmacy cost			
(provided at or for CBOC			
including contract and			
Consolidated Mail Out			
Pharmacy (CMOP)			

<sup>\*</sup> Do not include costs for the services associated with existing patients being transferred from the parent facility to the CBOC.

Table 9d.2 Recurring Costs	Start-up Year	Year 2	Year 3
cont			
(6) Additional specialty care			
costs (provided for the CBOC			
including at the parent facility,			
referral sites, or contract)			
(6) Contractual Services (all			
inclusive for contract model)			
(7) Other Miscellaneous cost			
(e.g., utilities)			
(8) Total Projected Budget			
(sum of preceding items (1)-(7))	\$	\$	\$
(9) For VA-staffed clinics,			
number of FTE			
a. Medical Doctor (MD)			
Doctor of Osteopathic Medicine			
(DO)			
b. Registered Nurse			
Practitioner (RNP),			
c. Physician Assistant (PA)			
d. Registered Nurse (RN)			
e. Licensed Vocational Nurse			
(LVN)			
f. Other (Specify)			
(10) Projected Unique Patients			
(total for first full fiscal year)			
(11) Projected Visits (total for			
first full fiscal year)			
(12) Cost per Unique (item 8			
divided by item 10)			
(13) Cost per Visit (item 8			
divided by item 11)			

- e. Provide details regarding any lease costs; i.e., square feet of space required and estimated cost per square foot. For contract clinics describe how costs were derived.
- f. Provide details regarding cost avoidance (fee-basis, beneficiary travel, renovation and/or capital expenditures) and revenue.

Table 9f. - Projected Cost Avoidance and/or Cost-Savings and Revenue

	Start-up Year	Year 2	Year 3
Projected Cost Avoid and/or Savings			
(specify in the			

following narrative)		
Projected increases in		
Medicalo Carew		
Collection Fund		
(MCCF) (based on		
parent facility MCCF		
collection rates)		
Projected Tricare or		
other non-MCCF		
revenues		
Total		
	\$ \$	\$

g. Accurate and consistent accounting for costs at each CBOC is an important issue. Describe how accurate and consistent cost accountability for the CBOC will be ensured following activation. Specifically a statement needs to be made acknowledging the need to report all CBOC cost through the Decision Support System (DSS).

### 10. CONTINGENCY PLAN FOR OVER-CAPACITY WORKLOAD

- a. Describe how 'new workload' at the CBOC will be limited or managed, if it exceeds workload or budget projections. For example: resource and/or FTE shifts from the parent facility, case management, increased use of telehealth technology, and other efficiencies.
- b. Describe how the potential impact of the CBOC workload on the parent facility's specialty clinics will be addressed (e.g., additional staff, community contracts, fee basis, sharing agreement, etc.).

### 11. STAKEHOLDER INVOLVEMENT REPORT

- a. Describe involvement and/or support of stakeholder groups in the service area of the proposed CBOC, as well as any future involvement anticipated for the CBOC. Outline, in chronological format, what has been done, or is planned, with regard to notifying and involving stakeholders. Provide information on the type of meetings (e.g., town hall, Veterans Service Organizations, community forums, etc.) as well as feedback received.
- b. Identify the Congressional Districts and United States Congressmen (by name) whose districts (by number) will be a part of the CBOC service area.
- **12. IMPLEMENTATION PLAN.** Detail the plans for implementing the clinic once the proposal is approved. Indicate the number of months it will take to open the CBOC following approval. Provide a timeline, not specific dates, for each of the processes and/or activities that need to occur in order for the CBOC to open. See the following suggested implementation plan:

Steps	Activities (will vary)	Timeline
1	Announce establishment of CBOC	
	(stakeholder notification)	
2	Lease space (if applicable)	
	a. Procure space	
	b. Recruit staff	
	c. Complete renovations and/or	
	furnishings	
	d. Train staff	
2	Contract activities (if applicable)	
	a. Prepare solicitation for contract	
	services	
	b. Response time for proposals	
	c. Evaluate proposals and select	
	contractor	
	d. Provide training and/or	
	orientation	
3	Schedule opening date	
4	Patient scheduling	
5	Assess final CBOC needs	
6	CBOC Opening	

- 13. EVALUATION PLAN. Describe the parent facility's plan to regularly evaluate how the CBOC is achieving the business plan and overall goals and objectives discussed in the proposal. Discuss how the VISN will coordinate this effort to ensure that the same minimal criteria are used to evaluate CBOCs throughout the VISN. Include a discussion of specific performance measures, workload and cost parameters, and minimum thresholds to be used in managing the CBOC and assessing its effectiveness. At a minimum, CBOC monitoring should include VA performance measures, the number of visits, type of visits (primary care, mental health), unique veterans, new and existing users, Priority 1-6 and 7 users, waiting times, unit costs, and patient satisfaction.
- **14. DATA SOURCES.** Use data from the <u>latest</u> completed fiscal year. Following are some suggested data sources; additional sources (i.e., zip code and specific data) are continually being added to these web pages.
- a. VSSC/PSSG CBOC Needs Assessment (mental health and primary care workload): <a href="http://vssc.med.va.gov/planning/cboc/CBOCStart.htm">http://vssc.med.va.gov/planning/cboc/CBOCStart.htm</a>
- b. Veteran population, by county, and by age group:
  <a href="http://vaww.pssg.med.va.gov/datamenu.asp">http://vaww.pssg.med.va.gov/datamenu.asp</a>: "Office of the Actuary 1990-2025 Vetpop by county (from 1990 Census)"
  - c. Distribute Planning Population Database (DPPB) Model:

<u>http://vaww.pssg.med.va.gov/pcproducts.asp</u>: "Facility Outpatient Utilization by County" for identifying market areas.

- d. Veteran enrollees, by county, by zip code, and by priority group (1-6 and 7): <a href="http://vaww.vsscportal.med.va.gov/cares/">http://vaww.vsscportal.med.va.gov/cares/</a>
- e. Enrollment Projections: http://vaww.vsscportal.med.va.gov/cares/
- f. Veteran users, by county and priority groups:
  <a href="http://vaww.pssg.med.va.gov/datamenu.asp">http://vaww.pssg.med.va.gov/datamenu.asp</a>: Unique Users by county and Priority (FY99-FY01)
- g. Veteran Historical User Information By Priority Group: http://152.125.187.140:8081/planning/Docs/Historical%20CBOC%20Information.xls)
  - h. CBOC workload database: <a href="http://vssc.med.va.gov/Planning/PLANHome.htm">http://vssc.med.va.gov/Planning/PLANHome.htm</a>
- i. Designated Health Professional Shortage Areas: <a href="http://bphc.hrsa.gov/databases/newhpsa/newhpsa.cfm">http://bphc.hrsa.gov/databases/newhpsa/newhpsa.cfm</a>
  - j. Medically Underserved Areas: http://bphc.hrsa.gov/databases/mua/searchbk.cfm
- k. Geographic distances between VA sites and between counties: Average distances (straight line), enrollees and users <a href="http://vaww.pssg.med.va.gov/datamenu.asp">http://vaww.pssg.med.va.gov/datamenu.asp</a> ZIP code data (from GDT as of 06/2001).
  - 1. Cost data: available through local Decision Support System (DSS).

#### APPENDIX C

### INSTRUCTIONS FOR COMPLETING CBOC SUMMARY SHEET

**NOTE:** This summary is the only paper going to Congress and requires strict adherence to standardization of format. The font must be Arial 11. Adhere to the format provided which should be limited to one page in length and includes using tables to provide information in following paragraphs 3 and 9. Only provide that information which is absolutely essential. Each of the twelve section headings on the Summary Sheet needs to be in bold, with the information and/or data provided in regular print.

- **1. Proposed Location.** Provide county or counties, not specific city or town. Specify Community-based Outpatient Clinic (CBOC) service area.
- 2. Parent Facility. Self-explanatory.
- **3.** List of Other Approved CBOCs Under Parent Facility Jurisdiction. Needs to be in table format; provide month and year.

CBOC Location(s)	Approval Date	<b>Opening Date</b>

- **4.** Congressional Districts (identify the district and the name representative(s)). Include all United States Congressmen whose districts are part of the service area.
- **5. Projected Opening Date.** Do not give the exact date. Project the number of months it will take to open, subsequent to approval. Be realistic. The expectation is for all clinics to be open within 1 year of approval.
- **6. Type of Care to be Provided.** Indicate if Primary Care and/or Primary Mental Health Care Services are to be provided.
- **7. Type of Arrangement.** For example:
  - a. VA-staffed in leased space.
  - b. Contract.
  - c. Sharing space with contractor to provide health care services
- 8. Projected Start-up Cost (total one-time and non-recurring). The one-time start-up cost.

9. Projected Annual Operating Budget and Workload (for the first full fiscal year of operation). This needs to be in a table format; see the following example:

Salary	\$
Real Property Rentals	\$
Radiology	\$
Laboratory	\$
Pharmacy	\$
Specialty Care	\$
Contractual Services	\$
Other Miscellaneous	\$
Total Projected Budget	\$
Full-time Equivalent (FTE)	
Projected Patients*	
Existing (1-6, 7-8)	
New (1-6, 7-8)	
Projected Visits	
Cost per Visit	\$

<sup>\*</sup>Projected Patients. Need to give separate numbers for both existing and new patients that will add up to Projected Patients. Both existing and new needs to be broken out by Priority 1-6, and Priority 7-8, as follows: New Users (1-6 and 7-8), Existing Users (1-6 and 7-8)

IU.	. Estimated cost savings.	This information is, or should, already to be provided in the
pro	pposal.	

BENEFICIARY TRAVEL FE	EE BASIS (	OTHER (identify)
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- **11. Will the new CBOC address an underserved population?** This refers to whether the area to be served is designated in the <u>Federal Register</u> as a medically underserved area. A simple Yes or No is sufficient without any detailed explanation.
- 12. Is the proposed CBOC listed in the most recent Veterans Integrated Service Network (VISN)'s Strategic Plan submission? A simple Yes or No is sufficient.